

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8163

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jehonany Alexander VALDEZ-Serrano,

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about February 23, 2008, within the Southern District of California, defendant Jehonany Alexander VALDEZ-Serrano, did knowingly and intentionally import approximately 20.92 kilograms (46.02 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Lorena Mulvihill
LORENA MULVIHILL
Special Agent
Immigration and Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, February 25, 2008.

Peter C. Lewis
PETER C. LEWIS
U.S. MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

I, Lorena Mulvihill with the U.S. Immigration and Customs Enforcement, declare under penalty of perjury, the following is true and correct:

On February 23, 2008, at approximately 1341 hours, Jehonany Alexander VALDEZ -Serrano entered the United States from the Republic of Mexico at the Calexico California West Port of Entry. VALDEZ was the driver, registered owner and sole occupant of a 2006 Mitsubishi Endeavor bearing Baja California, Mexico license plate number AHY5122. Customs and Border Protection Officers searched the vehicle VALDEZ was driving and discovered nineteen (19) packages containing a white powdery substance concealed within a non-factory compartment located in the dash of the vehicle. A sample from one of the packages was obtained which field-tested positive for cocaine. The combined weight of the 19 packages was 20.92 kilograms (46.02 pounds) of cocaine.

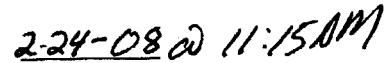
VALDEZ was advised of his Constitutional rights according to Miranda, which he acknowledged and waived, agreeing to be interviewed. VALDEZ admitted knowledge of the narcotics in the vehicle. VALDEZ stated he agreed to drive the vehicle across the border from Mexicali, MX to the United States for financial gain and threats made against his family.

Executed on February 23, 2008 at 2100 hours.


Special Agent

On the basis of the facts presented in the probable cause statement consisting of one page, I find probable cause to believe that the defendant named in this probable cause statement committed the offense on February 23, 2007, in violation of Title 21, United States Code, Sections 952 and 960.


United States Magistrate Judge


Date/Time